



Lawrence S. Lustberg

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May 23, 2025

**VIA ECF**

~~NOTICE OF PLEA~~ ~~NOTICE OF ENDORSEMENT~~

Honorable Sidney H. Stein  
U.S. District Judge, Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

*May 28, 2025*  
*so ordered.*  
*Sidney H Stein*  
*WSOS*

**Re:** United States v. Robert Menendez, et al., Case No. 1:23-cr-00490-SHS

Dear Judge Stein:

As the Court is aware, this Firm has represented Defendant Wael Hana in the above-captioned matter. On Monday of this week, Mr. Hana surrendered to the Federal Prison Camp, Fairton, to commence the service of his sentence. There is, accordingly, no basis for his bail to remain posted and, at the request of the Office of Pretrial Services, I therefore write to request that the Court order that certain property held in connection with Mr. Hana's bail be released. Specifically, as directed by the Court, Mr. Hana previously surrendered his travel documents, such as his passport, to the Office of Pretrial Services, posted \$300,000 in cash with the Clerk's Office, pledged his interests in the entity Henry Street Plaza LLC, and posted certain personal property with counsel. *See ECF Nos. 15, 59, 512.* Now that Mr. Hana has timely surrendered to serve his sentence, he respectfully requests that the Court order the release of his travel documents from the Office of Pretrial Services, which has no objection, and of his personal property to counsel, to be transferred at Mr. Hana's direction. In addition, we respectfully request that the Court order the release of Mr. Hana's interests in Henry Street Plaza LLC and that, as previously ordered by the Court at the request of the Government, the \$300,000 be put towards Mr. Hana's upcoming fine obligation, scheduled for July 1, 2025.

If these requests are amenable to the Court, we request that the Court "so order" this letter and direct its entry onto the docket. Of course, if Your Honor has any questions or concerns with regard to this request, please do not hesitate to call me. Thank you, as always, for your consideration of this matter.

Respectfully submitted,

s/ Lawrence S. Lustberg  
Lawrence S. Lustberg